

Federal Financial Assistance Management Improvement Act of 1999: Public Law 106-107
Public Comments: March 19, 2001

from Southcentral Foundation, 4501 Diplomacy Drive, Ste., 200; Anchorage, AK 99508
Mission: Working together with the Native community to achieve wellness through health and related services

Southcentral Foundation has solicited comments from its administrative and management staff and now submits the following comments related to the objectives specified in the “Interim/Draft Plan of Action To Implement Public Law 106-107, the Federal Financial Assistance Management Improvement Act of 1999”:

- I. Application and Reporting Forms / Objective: To streamline and simplify application, proposal, and reporting requirements and procedures for Federal financial assistance programs administered by the agencies.
 - A. Identify application and reporting forms that could be improved.
 - B. Identify data elements that could be eliminated or combined.
 - *Comment: Consolidate “Assurances” and “Certifications” into one form requiring only one signature. [Linda Hoyt, Manager, Planning & Grants]*
 - C. Identify programs that could share common application forms and reporting forms (e.g., standardize).
 - D. Identify how needed forms are obtained (Internet? In materials from agency?) and difficulty in finding updated forms.
 - *Comment: Application forms are obtained a couple of ways: by downloading those that are available on the Internet (however, they are not always the most recent edition) and by using forms that are mailed from the agency. [Pat Tegtmeier, Proposal Writer, Planning and Grants]*
- II. Terms and Conditions / Objective: To streamline and simplify Federal agencies’ grant terms and conditions.
 - A. Identify terms and conditions attached to grants that are not consistent from program to program and across Federal agencies.
 - *Comment: Matching funds seems to be an issue. There is some inconsistency about carrying over and moving funds within a grant. [Katherine Gottlieb, President/CEO]*
 - *Comment: Short time frame for expending the award. When we get an award, it is usually just minutes before the grant starts; then we must run a recruitment ad, interview, hire, wait for the selected applicant to quit his current job. Lots of grant money time is lost and we can’t make it up. We can’t supplant any funds, so tasks can’t even be handled by a current employee, even temporarily. Difficult situation. [Nancy Edtl, Vice President and Business Manager, Human Services]*
 - *Comment: Would like to see the notice of grant awards received before the fiscal year begins. Too often, it is received months after. [Kim Leming, Grants Administrator, Planning and Grants]*
 - B. Suggestions for creating more uniformity.
 - *Comment: We need clear understanding from the RFP as to whether it is allowable to use or not use the grant funds for match on other grants. [Keith Vorachek, Finance Manager, Medical Services]*

- *Comment: It would be nice to have more liberty to move the money around while staying within the parameters of the grant. Also, if we always had two years to spend a year of money it would really help. It would be consistent; e.g., we now have this flexibility through a grant from the Family Violence Prevention and Services Program, Office of Community Services, Administration for Children and Families, U.S. Dept. of Health and Human Services. [Nancy Edtl, Vice President and Business Manager, Human Services]*

III. Payment Systems / Objective: To have non-Defense agencies select either the HHS Payment Management System or the Automated Standard Applications for Payments; and the Department of Defense to use the Defense Procurement Payment System.

- Identify current payment systems we are required to use to receive grant payments.
- Identify which of the above payment systems offer on-line services.
- How the use of multiple payment systems affects our financial system.

IV. Audit Issues / Objective: To streamline and simplify audit-related requirements and services.

- What can Federal agencies do to improve our understanding of the “Single Audit” process?
- Have we used the “Single Audit Clearinghouse” for information on sub-recipient audits?
- Do “Single Audits” give appropriate audit coverage for our programs?

V. Electronic Processing / Goals: To allow applicants the option to electronically apply for, and report on the use of funds; and to improve interagency and intergovernmental coordination of information collection and sharing.

- Which electronic processing do we currently use for federal grants? Which are required by an agency, as well as which are used for other technologies?

- *Comment: We currently use the Grants Management System (GMS), which is required by the Office of Justice Programs for submission of grant applications. The first time we used it in early 2000, it had kinks to be worked out. For example, although we registered far in advance in order to submit an application, the registration was void when we were ready to submit the application and had to register again. Although the SF 424, the program narrative, and the budget detail and narrative of the application were submitted electronically, we still had to fax signed documents and other attachments; then, due to kinks in the electronic process, we had to send the entire proposal by FedEx. This year, registration went more smoothly; however, it took more than five hours to “sign in” when we were ready to submit one of our applications. Attachments still had to be faxed to two separate numbers, and the agency also requested that we FedEx the entire proposal due to the uncertainty associated with the electronic transmission. [Pat Tegtmeier, Proposal Writer, Planning and Grants]*

- Would we use an on-line application or financial reporting system?

- *Comment: It would be nice to be able to complete and file forms 269 and 272 electronically. I know that NOAA has the ability to receive form 272 via the Internet, but as far as I know they are the only ones. Another idea would be to have the ability to download financial reports in a format that will allow them to be*

completed and printed to a local printer in lieu of electronic format. [Keith Vorachek, Finance Manager, Medical Services]

C. How can Federal agencies prepare our organization for future use of electronic processing as an option for our grants?

- *Comment: Provide financial and budget forms in Excel – or available on a Web site – or easily converted. Need to be able to add our information on-line and save it without losing all the information added into the form. [Linda Hoyt, Manager, Planning & Grants]*